UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a/ SHAREHOLDER.COM,

Plaintiff.

v.

Civil Action No. 04-10535-PBS

CCBN.COM, INC., THE THOMSON CORPORATION, JOHN DOES 1 THROUGH 5, and JANE DOES 1 THROUGH 5,

Defendants.

DEFENDANTS CCBN.COM AND THE THOMSON CORPORATION'S MOTION TO IMPOUND THEIR OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL DEFENDANTS TO DESIGNATE A KNOWLEDGEABLE RULE 30(B)(6) REPRESENTATIVE AND TO PERMIT DESIGNEE TO TESTIFY TO FACTUAL INFORMATION

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson") submit this Assented-To Motion to Impound their Opposition to plaintiff Direct Report Corporation d/b/a/ Shareholder.com's ("Shareholder") Motion to Compel Defendants to Designate a Knowledgeable Rule 30(b)(6) Representative and to Permit Designee to Testify to Factual Information.

Impoundment is necessary because defendants' Opposition contains references to, and attaches excerpts from, transcripts of a deposition, portions of which have been designated as either "Confidential" and "Highly Confidential," which requires a motion for impoundment under the terms of the Stipulated Protective Order (attached as Exhibit A). Plaintiff has assented to this Motion.

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON CORPORATION,

By its attorneys,

Anthony S. Fiotto (BBO #558089)
David M. Moss (BBO #649707)

GOODWIN PROCTER LLP

Exchange Place

Boston, Massachusetts 02109-2881

Telephone: (617) 570-1000 Facsimile: (617) 523-1231

DATED: December 13, 2004

LIBA/1439078.1